

# Exhibit 2

**PATTERSON LAW GROUP, APC**

## Lodestar Calculation

*Buckeye Tree Lodge, et al. v. Expedia, Inc., et al.*

From inception through February 23, 2021

	General Description	Hours	Rate	Lodestar
1.	<b><i>Pre-Filing Investigation and Tasks:</i></b> Conduct client and witness meetings and interviews; perform legal research and analysis of claims; review clients' documents; research defendants' practices; perform searches and screen captures of defendants' practices; draft complaint	22.7	\$895 (AHG) <sup>1</sup>	\$20,316.50
		18.8	\$895 (JRP)	\$16,826.00
		38.6	\$750 (EAM)	\$28,950.00
2.	<b><i>Pleadings and Legal Research:</i></b> Oppose two motions to dismiss; draft motion to strike answer; draft motion to intervene; draft amended and consolidated complaints; legal research and analysis of claims and elements of proof	78.3	\$895 (AHG)	\$70,078.50
		30.4	\$895 (JRP)	\$27,208.00
		78.8	\$695 (JMF)	\$54,766.00
		10.7	\$750 (EAM)	\$8,025.00
		167	\$450 (JQ)	\$75,150.00
3.	<b><i>Discovery:</i></b> Propound and respond to written discovery, including document requests, interrogatories, requests for admissions, and deposition notices as to all defendants; prepare witnesses for depositions; defend depositions; review and analyze documents; take depositions of multiple defense witnesses and third party; serve and respond to subpoenas to third parties; meet and confer regarding discovery; move to compel further responses	525.9	\$895 (AHG)	\$470,680.50
		105.7	\$895 (JRP)	\$94,601.50
		15.7	\$695 (JMF)	\$10,911.50
		9.1	\$750 (EAM)	\$6,825.00
		233.7	\$450 (JQ)	\$105,165.00

<sup>1</sup> AHG = Allison H. Goddard; JRP = James R. Patterson; JMF – Jennifer M. French; EAM = Elizabeth A. Mitchell; JQ = Jacquelyn Quinn

	General Description	Hours	Rate	Lodestar
4.	<b><i>Motion for Class Certification:</i></b> Draft motion for class certification and supporting documents; argue motion at hearing	226.7	\$895 (AHG)	\$202,896.50
		32.9	\$895 (JRP)	\$29,445.50
		77.6	\$450 (JQ)	\$34,920.00
5.	<b><i>Renewed Motion for Class Certification:</i></b> Draft renewed motion for class certification and supporting documents; argue motion at hearing	122.5	\$895 (AHG)	\$109,637.50
		28.5	\$895 (JRP)	\$25,507.50
		9.0	\$450 (JQ)	\$4,050.00
6.	<b><i>Investigation of Expedia's Practices and Correspondence with Class Members:</i></b> Conducted multiple internet searches to assess Expedia's practices and identify hotel properties that were incorrectly listed on Expedia websites; interviewed class members regarding relationship with Expedia and appearance on Expedia websites	38	\$895 (AHG)	\$34,010.00
		23.2	\$895 (JRP)	\$20,764.00
		10.4	\$750 (EAM)	\$7,800.00
		34.5	\$450 (JQ)	\$15,525.00
7.	<b><i>Expert Witnesses:</i></b> Research and interview potential experts; work with expert to develop analyses and reports; prepare for, travel to and from, and defend expert depositions; take depositions of opposing experts	163.9	\$895 (AHG)	\$146,690.50
		63.5	\$895 (JRP)	\$56,832.50
		29.2	\$695 (JMF)	\$20,294.00
		5.2	\$450 (JQ)	\$2,340.00
8.	<b><i>Mediation and Settlement Negotiations:</i></b> Participate in Court-ordered ADR program, including travel to San Francisco for mediation; participate in ongoing settlement negotiations and strategies; prepare for and attend mediations with private mediator at JAMS; prepare for and attend further Court-ordered settlement conference	143.1	\$895 (AHG)	\$128,074.50
		102.8	\$895 (JRP)	\$92,006.00
		20.5	\$695 (JMF)	\$14,247.50
		3.0	\$750 (EAM)	\$2,250.00
		3.5	\$450 (JQ)	\$1,575.00

	General Description	Hours	Rate	Lodestar
9.	<b>General Case Management Issues:</b> Meet and confer with co-counsel and opposing counsel over various case management and scheduling issues; conference calls; prepare case management statements and stipulations re extensions; attend case management hearings; develop case strategy	66.4	\$895 (AHG)	\$59,428.00
		52.5	\$895 (JRP)	\$46,987.50
		18.8	\$695 (JMF)	\$13,066.00
		19.4	\$750 (EAM)	\$14,550.00
		8.2	\$450 (JQ)	\$3,690.00
10.	<b>Settlement Agreement:</b> Negotiated terms; legal research and drafted settlement agreement and supporting documents; conferred with clients; post mediation conferences with mediator and defense counsel	3.5	\$695 (JMF)	\$2,432.50
11.	<b>Motions for Approval:</b> researched and drafted motion for approval; drafted declarations and other documents in support of motion for approval; prepared for hearing for final approval	19.2	\$695 (JMF)	\$13,344.00
	AHG TOTAL	1,387.5	\$895	\$1,241,812.50
	JRP TOTAL	458.3	\$895	\$410,178.50
	JMF TOTAL	185.7	\$695	\$129,061.50
	EAM TOTAL	91.2	\$750	\$68,400.00
	JQ TOTAL	538.7	\$450	\$242,415.00
	<b>TOTAL FEE LODESTAR</b>	2,661.4		<b>\$2,091,867.50</b>